

### R E M A R K S

Careful review and examination of the subject application are noted and appreciated.

### SUPPORT FOR CLAIM AMENDMENTS

Support for the amendments to the claims can be found in the drawings as originally filed, for example, in FIGS. 2-4 and in the specification as originally filed, for example, on page 2, line 17 through page 3, line 4, on page 6, line 19 through page 8, line 10 and on page 10, lines 7-13. As such, no new matter has been introduced

### CLAIM OBJECTIONS

The objections to claims 4, 6, 7, 10, 11, 19 and 20 have been obviated by appropriate amendment and should be withdrawn.

With respect to the objection to claims 1, 5, 11 and 13-15, Applicants' representative respectfully disagrees with the requirement to delete the word "the" prior to the word "step" or the word "steps." Specifically, the transitional phrases "the step of:" and "the steps of:" do not appear to be unacceptable at the end of a claim preamble according to §37 of Landis On Mechanics of Patent Claim Drafting, Fourth Edition. Furthermore, a check of the USPTO patent full-text and image database found that 517,785 patents have issued which contain the transitional phrase of either

"the step of:" or "the steps of:" in the claims. As such, Applicants' representative respectfully requests that the objections be withdrawn or that the Examiner provide the specific authority relied upon for making the requirement.

#### **CLAIM REJECTIONS UNDER 35 U.S.C. §103**

The rejection of claims 1-20 under 35 U.S.C. §103(a) as being unpatentable over Lee (U.S. Patent No. 5,696,943; hereinafter Lee '943) in view of Lee et al. (U.S. Patent No. 6,453,454; hereinafter Lee '454) has been obviated by appropriate amendment and should be withdrawn.

In contrast to the cited references, the presently claimed invention (claim 1) provides a method for re-using diffused cell-based IP blocks in a structured application specific integrated circuit comprising the steps of (A) implementing an original view of one or more blocks of intellectual property (IP) using a plurality of cell-based building blocks, wherein all of the plurality of cell based building blocks are used by the one or more blocks of intellectual property and (B) providing one or more alternative views for at least one of the one or more blocks of intellectual property, wherein each of the one or more alternative views (i) realizes an alternative functionality for the at least one of the one or more blocks of intellectual property and (ii) re-uses at least one cell-based building block used in the original

view by the at least one of the one or more blocks of intellectual property. Claims 16 and 18 include similar recitations.

The combination of Lee '943 and Lee '454 does not teach or suggest each and every element of the present claimed invention. Specifically, Lee '943 teaches providing "spare gates" to ease debugging silicon before the first tapeout (See Abstract of Lee '943) and Lee '454 teaches "reserving" gate array cells for ECO modifications (see Abstract of Lee '454). Since Lee '943 teaches the gates are "**spares**" and used to "**debug**" the silicon and Lee '454 teaches that gate array cells should be "**reserved**" for ECO modifications, it follows that Lee '943 and Lee '454, alone or in combination, do not teach or suggest either implementing an original view of one or more blocks of intellectual property (IP) using a plurality of cell-based building blocks, **wherein all of the plurality of cell based building blocks are used by the one or more blocks of intellectual property** or providing one or more alternative views for at least one of the one or more blocks of intellectual property, **wherein each of the one or more alternative views (i) realizes an alternative functionality for the at least one of the one or more blocks of intellectual property** and (ii) re-uses at least one cell-based building block used in the original view by the at least one of the one or more blocks of intellectual property, as presently claimed. Therefore, Lee '943 and Lee '454 do not teach or suggest each and every element of the present claimed

invention. As such, the presently claimed invention is fully patentable over the cited references and the rejection should be withdrawn.

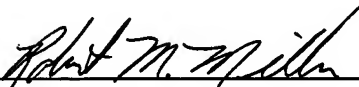
Accordingly, the present application is in condition for allowance. Early and favorable action by the Examiner is respectfully solicited.

The Examiner is respectfully invited to call the Applicants' representative between the hours of 9 a.m. and 5 p.m. ET at 586-498-0670 should it be deemed beneficial to further advance prosecution of the application.

If any additional fees are due, please charge Deposit Account No. 12-2252.

Respectfully submitted,

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